

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to case no. 18-CV-05053
(LAK).

MASTER DOCKET

18-MD-2865 (LAK)

**NOTICE OF PLAINTIFF-COUNTERCLAIM-DEFENDANT
SKATTEFORVALTNINGEN'S MOTION TO DISMISS
THE AMENDED COUNTERCLAIMS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated May 6, 2019, and the Declaration of Sarah L. Cave, dated May 6, 2019, with all exhibits thereto, Plaintiff-Counterclaim-Defendant Skatteforvaltningen, by its undersigned attorneys, will move the Court before the Honorable Lewis A. Kaplan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the Court, for an order pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing Defendants-Counterclaimants Goldstein Law Group PC 401(K) Profit Sharing Plan and Sheldon Goldstein's Amended Counterclaims Against Skatteforvaltningen with prejudice, and for such other and further relief as the Court deems just and proper. Skatteforvaltningen respectfully requests that the Court hold oral argument regarding this Motion.

Dated: New York, New York
May 6, 2019

HUGHES HUBBARD & REED LLP

By: /s/ Sarah L. Cave
William R. Maguire
Marc A. Weinstein
Sarah L. Cave
John T. McGoey
One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
bill.maguire@hugheshubbard.com
marc.weinstein@hugheshubbard.com
sarah.cave@hugheshubbard.com
john.mcgoey@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*